

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JORGE JOYA,

Plaintiff,

Civil Action No.: 08CV5328(PKL)

-against-

NOTICE OF MOTION

VERIZON NEW YORK, INC., and
MASTEC NORTH AMERICA, INC.,

Defendants.
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NOTICE OF MOTION FOR A MORE DEFINITE STATEMENT ON BEHALF OF
VERIZON NEW YORK, INC.

PLEASE TAKE NOTICE that, upon the annexed affidavit of Deborah A. Bass, sworn to on the 8th day of August, 2008, and upon the complaint herein, defendant Verizon New York, Inc. will move this Court at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, at a date and time designated by the Court, for an order, pursuant to Federal Rule of Civil Procedure 12(e), that the plaintiff be ordered to furnish a more definite statement of the matters stated in the complaint.

Dated: New York, New York
August 8, 2008

Respectfully submitted,



Deborah A. Bass (DAB - 8760)
LEDY GURREN BASS & SIFF, LLP
Attorneys for defendant
Verizon New York, Inc.
475 Park Avenue South, 8th Floor
New York, New York 10016

To: Ginarte, O'Dwyer, Gonzalez
& Winograd, LLP
Attorneys for Plaintiff
225 Broadway, 13th Floor
New York, NY 10007
(212) 601-9700

Jones, Hirsch Connors & Bull, P.C.
Attorneys for Defendant
Mastec North America, Inc.
One Battery Park Plaza
New York, New York 10004
(212) 527-1000